

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SARAH PALIN, an individual,

Plaintiff,

– against –

THE NEW YORK TIMES COMPANY,
a New York corporation,

Defendant.

No. 17 Civ. 4853

Hon. Jed S. Rakoff

ECF Case

PLAINTIFF’S PROPOSED VOIR DIRE REQUESTS

TURKEL CUVA BARRIOS, P.A.
100 North Tampa Street, Suite 1900
Tampa, Florida 33602
Telephone: (813) 443-2199
Facsimile: (813) 443-2193

and

GOLENBOCK EISEMAN ASSOR BELL
& PESKOE LLP
711 Third Avenue
New York, NY 10017
Telephone: (212) 907-7300
Facsimile: (212) 754-0330
Facsimile: (212) 754-0330

Attorneys for Plaintiff Sarah Palin

PROPOSED QUESTIONS

1. Have you read or heard anything about this case before today?
2. Have you read or posted any comments about this case on social media?
3. Do you subscribe to any news websites or apps and, if so, do you receive push notifications from any news websites or apps?
4. Do you hold any opinions about Sarah Palin?
5. Do you hold any opinions about the New York Times?
6. Have you, any of your family members, or anyone close to you ever worked at the New York Times?
7. Have you, any of your family members, or anyone close to you ever worked for any news organization or media company?
8. Have you, any of your family members, or anyone close to you ever been the victim of gun violence?
9. Do you have any opinions about the Second Amendment or gun control?
10. Do you belong to any political organizations or special interest groups and, if so, which ones?